

**G O D D A R D L A W P L L C**

39 Broadway, Suite 1540 | New York, NY 10006

Office. 646.964-1178

Fax. 212.473.8705

Megan@goddardlawnyc.com

WWW.GODDARDLAWNYC.COM

June 6, 2025

**VIA ECF**

The Honorable Judge Kenneth M. Karas  
United States District Court  
Southern District of New York  
300 Quarropas Street, Courtroom 521  
White Plains, New York 10601

**Re: Hairston v. The Winifred Masterson Burke Rehabilitation Hospital et al.**  
**Case No.: 7:25-cv-03908-KMK**

Dear Honorable Judge Karas:

The undersigned is counsel to Plaintiff Kyle Hairston ("Plaintiff") in the above-referenced matter. I write jointly with counsel for Defendants, to respectfully propose a schedule for the Parties' anticipated pleadings.

Plaintiff started this action by filing a Summons with Notice in the New York State Supreme Court, Westchester County on January 9, 2025. Counsel for Defendants removed this case to this Court on May 9, 2025. Plaintiff did not file a Complaint before the matter was removed to this Court.

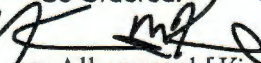
Accordingly, the Parties respectfully propose the following schedule for filing the anticipated pleadings:

Plaintiff's deadline to file a complaint	June 27, 2025
Defendant's deadline to Answer or otherwise respond to Plaintiff's complaint	August 11, 2025
Initial Conference	To be set by the Court at your Honor's convenience

We thank the Court for its time and attention to this matter and its consideration of this request.

The pleading schedule proposed herein is approved. The Court will hold an initial conference on 9/9/25 at 2:30 via

So Ordered.

 6/6/25  
cc: All counsel [Via ECF]

Respectfully submitted,

GODDARD LAW PLLC

/s/ Megan S. Goddard

By: Megan S. Goddard, Esq.